

HARRY M. RODERICK, the Complainant in this cause, after being duly sworn, deposes and says:

Questions by Mr. Offutt:

Q. State your name, age and residence.

A. My name is Harry M. Roderick, I am 59 years of age and reside near Urbana, Frederick County, Maryland.

Q. How long have you resided at that address?

A. I have lived in the general neighborhood for about 57 years.

Q. Mr. Roderick, you are a Complainant in Equity Cause No. 16357 in which you filed a Bill of Complaint in the Circuit Court for Frederick County, is that right?

A. Yes, it is.

Q. Will you state whether or not you are the owner of a farm located in Urbana Election District, Frederick County, Maryland, on a road leading from Urbana to Thurston and which you acquired from Andrew M. Roderick and A. Viola Roderick, his wife, by Deed dated April 13, 1926 and recorded in Liber 358, folio 71, one of the Land Records of Frederick County?

A. Yes, I am.

Q. I show to you a certified copy of the Deed from Andrew M. Roderick and wife to you and Eula I. Roderick, your wife, and I ask you if this appears to be a certified copy of your Deed?

A. Yes, it is.

(Certified copy of Deed dated April 13, 1926, and recorded in Liber 358, folio 71, one of the Land Records of Frederick County, from Andrew M. Roderick and A. Viola Roderick, his wife, to Harry M. Roderick and Eula I. Roderick, his wife, offered into evidence and marked "Complainants' Exhibit A.")

Q. After you purchased the property referred to, will you state whether or not you and Mrs. Roderick ever executed a Mortgage on that property?

A. Yes, we did.

Q. To whom did you make the Mortgage and in what amount?

A. We mortgaged our farm to my father, William Mc. Roderick on April 13, 1926 at the same time we bought the farm and the amount of the Mortgage was \$16,000.00